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*Of Attorneys for Plaintiff City of Portland*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**CITY OF PORTLAND**, a municipal  
corporation of the State of Oregon,

**3:14-cv-01958-SI**

**PLAINTIFF,**

v.

**UBER TECHNOLOGIES, INC.**, a Delaware  
corporation, and **RASIER, LLC**, its wholly  
owned subsidiary,

**DEFENDANTS.**

**AFFIDAVIT OF TRACY REEVE**

(In Support of Plaintiff's Motion for a  
Temporary Restraining Order and Preliminary  
Injunction)

STATE OF OREGON)  
) ss.  
County of Multnomah)

I, TRACY REEVE, being first duly sworn, state:

1. I am the City Attorney for the City of Portland, Oregon, and am one of the attorneys  
representing plaintiff City of Portland in the above-entitled case.

2. I make this affidavit in support of Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunction.

3. Attached hereto as Exhibit A is a true and accurate copy of the current version of City of Portland Code Chapter 16.40 Private For-Hire Transportation Regulations.

4. Attached hereto as Exhibit B is a true and correct copy of the current version of Chapter 16.40 of the Private For-Hire Transportation Regulations – Administrative Rules promulgated by the Private For-Hire Transportation Board of Review.

5. Attached hereto as Exhibit C is a true and accurate copy of a cease and desist order by letter dated December 8, 2014, from the City of Portland Bureau of Transportation to Ms. Brooke Steger, General Manager, Uber, Inc.

6. Attached hereto as Exhibit D is a true and accurate copy of a letter dated December 8, 2014, from the City of Portland Office of Management and Finance to Uber Technologies, Inc. regarding registering the business with the City of Portland's Revenue Bureau.

7. Attached hereto as Exhibit E is a true and accurate printout of the results of an online search at the website of the Oregon Secretary of State Corporation Division, Business Name Search. Results show no active or inactive business related to Uber Technologies, Inc.

8. Attached hereto as Exhibit F is a true and accurate printout of the results of an online search at the website of the Oregon Secretary of State Corporation Division, Business Name Search. Results show no active or inactive business related to Rasier, LLC

9. Attached hereto as Exhibit G are true and accurate samples of Uber ads placed on Craigslist from November 4, 2014, through December 8, 2014. During that time period, the Craigslist website shows 677 Uber ads for drivers.

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10. Attached hereto as Exhibit H is a true and accurate copy of the December 8, 2014, email from Tracy Reeve to Uber attorney Gregory Chaimov giving notice of the intent to appear at ex parte in Multnomah County Circuit Court on December 9, 2014, at 1:30 p.m.

11. Attached hereto as Exhibit I is a true and accurate copy of the Complaint for Permanent Injunction, Civil Penalties, Restitution and Other Equitable Relief filed in the case of *The People of the State of California v. Uber Technologies, et al.*, Case No. CGC-14-543120, in the Superior Court of the State of California, City and County of San Francisco.

s/ Tracy Reeve  
Tracy Reeve

SUBSCRIBED AND SWORN TO before me this 10<sup>th</sup> day of December, 2014, by Tracy Reeve.

s/ Jody L. Thoman  
Notary Public for Oregon  
My commission expires: 10/29/2014